

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

**IN RE: JOHNSON & JOHNSON TALCUM
POWDER PRODUCTS MARKETING, SALES
PRACTICES AND PRODUCTS LIABILITY
LITIGATION**

MDL: 16-2738 (FLW) (LHG)

**JUDGE WOLFSON
MAG. JUDGE GOODMAN**

**This relates to the following cases included on
Exhibit A to Defendants' Motion to Dismiss
Plaintiffs' Complaints:**

Baxter, Corrine: 3:17-cv-07780
Joseph, Shintelle: 3:16-cv-07465

**RESPONSE TO DEFENDANTS' MOTION TO DISMISS PLAINTIFFS'
COMPLAINTS PURSUANT TO RULE 41 (b)**

May it please the Court:

Plaintiffs, Corinne Baxter and Shintelle Joseph respectfully submit this Response to Defendants' Motion to Dismiss Plaintiffs' Complaints pursuant to Rule 41(b).

1. Plaintiff Corinne Baxter

Plaintiff Corinne Baxter has informed undersigned counsel that she no longer wishes to pursue her case and instructed counsel not to oppose Defendants' motion to dismiss her complaint. Accordingly, undersigned counsel does not submit an opposition on behalf of Plaintiff, Corinne Baxter.

2. Plaintiff Shintelle Joseph

Undersigned counsel have contacted plaintiff by phone and by mail, however, plaintiff has continued to be unresponsive to counsel's numerous requests. Undersigned counsel have explained to Plaintiff the ramifications of her refusal to comply with this Court's orders. Undersigned counsel therefore does not submit an opposition on behalf of Plaintiff, Shintelle Joseph.

Conclusion:

Undersigned counsel, on behalf of Plaintiffs, Corinne Baxter and Shintelle Joseph, respectfully submit this response as they have no opposition to the Defendants' Request to Dismiss the cases of Plaintiffs Corinne Baxter and Shintelle Joseph for the above stated reasons.

This the 29th day of September, 2020.

RESPECTFULLY SUBMITTED,

/s/ Douglas R. Plymale

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Certificate of Service

I hereby certify that on September 29, 2020, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all attorneys of record.

THE DUGAN LAW FIRM, APLC

/s/ Douglas R. Plymale
Douglas R. Plymale